

Proposal Subject	Wet Storage Water Quality in Artificial Bodies Water
Specific NSSP Guide Reference	NSSP Guide Model Ordinance Chapter X. General Requirements for Dealers .08 Wet Storage in Artificial Bodies of Water C. Water Supply (1) General
Text of Proposal/ Requested Action	<p>Modify Chapter X.08.C.</p> <p>.08 Wet Storage in Artificial Bodies of Water.</p> <p>C. Water Supply.</p> <p>(1) General.</p> <p>(a) ...</p> <p>(b) ...</p> <p>(c) ...</p> <p>(d) ...</p> <p>(e) ...</p> <p>(f) Disinfected water entering the wet storage tanks shall have no detectable levels of the coliform group as measured by a recognized multi tube MPN test per 100 ml. for potable water.</p> <p>(g) <u>(i)</u> When the laboratory analysis of a single sample of disinfected water entering the wet storage tanks shows any positive result for the coliform group, daily sampling shall be immediately instituted until the problem is identified and eliminated.</p> <p><u>(ii)</u> <u>Upon notification from the certified lab processing wet storage water samples of any single sample exceeding 14 MPN (growing area standard), product in the wet storage system at that time shall be placed on hold and not released for sale until the problem causing the disinfected water to show a positive result for the fecal coliform group is eliminated and verified according to Chapter X §. 08.C. (1)(g).</u></p> <p><u>(iii)</u> <u>In the event the wet storage system must be shut down to effect repairs and that period of time is sufficient to sacrifice the health of the animals, shellstock shall be discarded, placed in an approved relay meeting the requirement of Chapter V or returned to a growing area under agreement with the Authority to assure they will not be re-harvested for sale in less than 6 months. On completion of repairs the ability of the system to produce water free from bacteria in the coliform group shall be reaffirmed in accordance with Chapter X § .08 C. (3)(c).</u></p> <p>(h) <u>(g)</u> When the problem that is causing disinfected water to show a positive result for the coliform group is eliminated, the effectiveness of the correction shall be shown on the first operating day following correction through the immediate collection, within a 24 hour period, of a set of three samples of disinfected water and one sample of the source water prior to disinfection.</p> <p>(i) <u>(h)</u> For water that is disinfected by ultraviolet treatment, turbidity shall not exceed 20 nephelometric turbidity units (NTUs) measured in accordance with <i>Standard Methods for the Examination of Water and Wastewater</i>, APHA.</p> <p>(j) <u>(i)</u> The disinfection unit(s) for the water supply shall be cleaned and serviced as frequently as necessary to assure effective water treatment.</p>

Implementation date: If passed by the 2001 ISSC, the effective date for implementation of this issue shall be immediately upon concurrence by the Food and Drug Administration.

**Public Health
Significance**

On December 22, 2000 Washington State Department of Health issued a letter informing Taylor Shellfish Company that in the event any of the routine water samples from their recirculating wet storage systems came back positive for fecal coliform bacteria, that product in the system was to be placed on hold. Product was not to be released for sale until the problem causing the positive fecal test was identified, repaired and the repair validated through sampling as prescribed in the Model Ordinance (MO).

While the MO states "Disinfected water entering the wet storage tanks shall have no detectable levels of the coliform group..." it is silent on the disposition of the product in the system if a water sample detects any level of coliform bacteria.

Taylor Shellfish has two recirculating wet storage systems, both of which have been in service for several years. On rare occasions, the 23,000-gallon system at the Shelton, Washington processing plant has had samples with fecal coliform levels in the 2-8 range. While we concur that these samples could be indicative of a problem with the water treatment system, we do not concur that this represents a public health hazard that merits putting all the product in the system on hold for what could be in excess of a week to get validation samples processed at the state certified lab. The lab does not operate on the weekend and will not receive samples late in the week for processing. If a failed sample notice were to come late in the week it would be well into the following week before validation samples could show the problem has been resolved.

This issue attempts to establish a response threshold for putting product on hold only if a sample is returned in excess of 14 MPN (the growing water standard).

**Cost Information
(if available)**

This particular system may have in the neighborhood of 30,000 pounds of product in it worth upwards of \$70,000 dollars. This represents roughly 3 days inventory moving through the system. Were it to be precluded from sale, depending on available tides, it is unlikely there will be available inventory to substitute for several days. If this issue is not adopted, under current MO interpretation, a 2 MPN sample result could potentially lose the company several days of sales and tie up \$70,000 worth of product that could be sold with no public health risk.

**Action by 2001
Task Force I**

Recommended referral of Issue 01-221 to appropriate committee as determined the Conference Chairman.

**Action by 2001
General Assembly**

Adopted recommendation of 2001 Task Force II.

Action by USFDA

Concurs with Conference action.

**Action by 2003
Depuration/Wet
Storage Committee**

Recommended adoption of the attached Decision Tree which will serve as interim guidance as a substitute for Proposal 01-221. The interim guidance will have an implementation date of October 1, 2003.

**Action by 2003
Task Force I**

Recommended adoption of Depuration/Wet Storage Committee recommendation on Proposal 01-221.

**Action by 2003
General Assembly**

Adopted recommendation of 2003 Task Force II.

Action by USFDA

Concurred with Conference Action.

**Action by 2005 PHP
Committee**

Recommended adoption of attached Interim Decision Tree adopted by the 2003 Conference with the addition of "confirm quality of source water" under Troubleshoot HACCP Plan and Operations block.

Action by 2005 Task Force II	Recommended adoption of Post Harvest Processing Committee recommendation on Proposal 01-221.
Action by 2005 General Assembly	Adopted recommendation of 2005 Task Force II.
Action by USFDA	Concurred with Conference action.

Protocol for addressing positive coliform sample
in an artificial wet storage water body

